

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE: CROP INPUTS ANTITRUST)	4:21-MD-2993-SEP
LITIGATION)	
)	ALL CASES

DEFENDANTS' MOTION TO STAY DISCOVERY

Defendants Bayer CropScience LP, Bayer CropScience Inc., BASF Corporation, Corteva Incorporated, Pioneer Hi-Bred International, Syngenta Corporation, Cargill, Incorporated, Univar Solutions, Incorporated, Winfield Solutions, LLC, CHS Incorporated, Federated Co-operatives Limited, GROWMARK, Incorporated, GROWMARK FS, LLC, Nutrien Ag Solutions, Incorporated, Simplot AB Retail Sub Incorporated, and Tenkoz, Inc. (collectively, "Defendants") hereby move this Court to stay all discovery pending resolution of their forthcoming motions to dismiss the Plaintiffs' Consolidated Amended Complaint. The facts and law in support of the motion are fully set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court grant Defendants' motion to stay discovery.

Respectfully submitted,

/s/ Troy Bozarth (with consent)

Troy A. Bozarth

HEPLERBROOM LLC

130 N. Main St.

P.O. Box 510

Edwardsville, IL 62025

Tel: (618) 656-0184

tab@heplerbroom.com

David J. Lender

Adam C. Hemlock

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

/s/ Christopher M. Hohn (with consent)

Christopher M. Hohn

Sharon B. Rosenberg

Edwin G. Harvey

THOMPSON COBURN LLP

One US Bank Plaza

St. Louis MO 63101

Phone: (314) 552-6000

chohn@thompsoncoburn.com

srosenberg@thompsoncoburn.com

Jonathan I. Gleklen

Laura S. Shores

New York, NY 10153
Tel: (212) 310-8000
David.Lender@weil.com
Adam.Hemlock@weil.com

Lara B. Bach
WEIL, GOTSHAL & MANGES LLP
1395 Brickell Avenue, Suite 1200
Miami, FL 33131
Tel: (305) 577-3100
Lara.Bach@weil.com

Counsel for Defendant BASF Corporation

/s/ Eric Mahr (with consent)
Eric Mahr
**FRESHFIELDS BRUCKHAUS
DERINGER US LLP**
700 13th Street NW, 10th Floor
Washington, DC 20005-3960
Tel: (202) 777-4545
Fax: (202) 777-4555
eric.mahr@freshfields.com

***Counsel for Defendant Cargill,
Incorporated***

/s/ Jason Leckerman (with consent)
Leslie E. John
Jason A. Leckerman
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
Tel: (215) 665-8500
johnl@ballardspahr.com
leckermanj@ballardspahr.com

***Counsel for Defendants Corteva, Inc.
and Pioneer Hi-Bred International, Inc.***

**ARNOLD & PORTER KAYE SCHOLER
LLP**

601 Massachusetts Ave., NW
Washington, DC 20001
Phone: (202) 942-5000
jonathan.gleklen@arnoldporter.com
laura.shores@arnoldporter.com

***Counsel for Defendants Bayer CropScience
LP and Bayer CropScience Inc.***

/s/ Kathy L. Osborn (with consent)

Kathy L. Osborn
**FAEGRE DRINKER BIDDLE & REATH
LLP**
300 N. Meridian St., Suite 2500
Indianapolis, IN 46204
Telephone: (317) 237-8261
Email: kathy.osborn@faegredrinker.com

Colby Anne Kingsbury
**FAEGRE DRINKER BIDDLE & REATH
LLP**
311 S. Wacker Dr., #4400
Chicago, IL 60606
Telephone: (312) 212-6573
Email: colby.kingsbury@faegredrinker.com

Counsel for Defendant CHS Inc.

/s/ Michael L. McCluggage (with consent)

Michael L. McCluggage
Barack S. Echols
EIMER STAHL LLP
224 S. Michigan Ave.
Suite 1100
Chicago, IL 60604
(312) 660-7600 (telephone)
(312) 692-1718 (facsimile)
mmccluggage@eimerstahl.com
bechols@eimerstahl.com

Collin J. Vierra

EIMER STAHL LLP
99 South Almaden Boulevard
Suite 662
San Jose, CA 85113
(669) 231-8755 (telephone)
(312) 692-1718 (facsimile)
cvierra@eimerstahl.com

***Counsel for Defendant Federated
Co-operatives Limited***

/s/ Barry S. Noeltner (with consent)

Barry S. Noeltner
**HEYL, ROYSTER, VOELKER &
ALLEN, P.C.**
Suite 100
Mark Twain Plaza III
105 West Vandalia Street
Edwardsville, Illinois 62025
Telephone: 618.656.4646
PRIMARY E-SERVICE -
edwecf@heyloyroyster.com
SECONDARY E-SERVICE -
bnoeltner@heyloyroyster.com

Michael A. Lindsay (MN Lic. #0163466)
F. Matthew Ralph (MN Lic. #0323202)
Jaime Stilson (MN Lic. #0392913)
DORSEY & WHITNEY LLP
50 South Sixth Street Suite 1500
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600
lindsay.michael@dorsey.com
ralph.matthew@dorsey.com
stilson.jaime@dorsey.com

***Counsel for Defendants GROWMARK, Inc.
and GROWMARK FS, LLC***

/s/ Eric D. Brandfonbrener (with consent)

Eric D. Brandfonbrener
PERKINS COIE, LLP
131 S. Dearborn St., Suite 1700
Chicago, IL 60603
(312) 324-8400
(312) 324-9400(facsimile)
ebrand@perkinscoie.com

Shylah R. Alfonso
PERKINS COIE, LLP
1201 Third Avenue Suite 4900
Seattle, WA 98101-3099
(206) 359-3980
(206) 359-4980 (facsimile)
salfonso@perkinscoie.com

/s/ G. Patrick Watson

G. Patrick Watson

Lindsay S. Johnson

**BRYAN CAVE LEIGHTON PAISNER
LLP**

1201 West Peachtree Street NW

Suite 1400

Atlanta, Georgia 30309

(404) 572-6600

(404) 572-6999 (facsimile)

patrick.watson@bclplaw.com

lindsay.johnson@bclplaw.com

Paul J. Lopach

Michael J. Hofmann

Luke Westerman

**BRYAN CAVE LEIGHTON PAISNER
LLP**

1700 Lincoln Street

Suite 4100

Denver, CO 80203

(303) 861-7000

(303) 866-0200 (facsimile)

paul.lopatch@bclplaw.com

michael.hofmann@bclplaw.com

luke.westerman@bclplaw.com

Travis H. Campbell

**BRYAN CAVE LEIGHTON PAISNER
LLP**

One Metropolitan Square

211 North Broadway, Suite 3600

St. Louis, MO 63102

(314) 259-2000

(314) 259-2020 (facsimile)

travis.campbell@bclplaw.com

***Counsel for Defendant Nutrien Ag
Solutions, Inc.***

***Counsel for Defendant Simplot AB
Retail, Sub, Inc.***

/s/ Paul S. Mishkin (with consent)

Paul S. Mishkin

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, NY 10017

Tel: 212-450-4292

paul.mishkin@davispolk.com

Robert T. Haar – #30044MO

Matthew A. Martin - #64000MO

HAAR & WOODS, LLP

1010 Market Street, Suite 1620

St. Louis, Missouri 63101

(314) 241-2224

(314) 241-2227 (Facsimile)

roberthaar@haar-woods.com

mmartin@haar-woods.com

Counsel for Defendant Syngenta Corporation

/s/ Lee A. Peifer (with consent)

Lee A. Peifer

James R. McGibbon

EVERSHEDS SUTHERLAND (US) LLP

999 Peachtree Street, NE, Suite 2300

Atlanta, GA 30309-3996

Tel: 404-853-8000

Fax: 404-853-8806

leepeifer@eversheds-sutherland.com

jimmcgibbon@eversheds-sutherland.com

Counsel for Defendant Tenkoz, Inc.

/s/ Nathan P. Eimer (with consent)

Nathan P. Eimer

Vanessa G. Jacobsen

Brian Y. Chang

Sarah H. Catalano

EIMER STAHL LLP

224 South Michigan Avenue, Suite 1100

Chicago, IL 60604

Tel: 312-660-7600

neimer@eimerstahl.com

vjacobsen@eimerstahl.com

bchang@eimerstahl.com

scatalano@eimerstahl.com

Counsel for Defendant Winfield Solutions, LLC

/s/ Craig C. Martin (with consent)

Craig C. Martin

Matt D. Basil

WILLKIE FARR & GALLAGHER LLP

300 North LaSalle

Chicago, IL 60654-3406

Telephone: (312) 728-9000

cmartin@willkie.com

mbasil@willkie.com

/s/ J. Nicci Warr (with consent)

J. Nicci Warr, #59975

7700 Forsyth Boulevard, Suite 1100

St. Louis, MO 63105

(314) 863-0800 (telephone)

(314) 863-9388 (facsimile)

nicci.warr@stinson.com

Alexander C. Barrett, #68695

230 West McCarty Street

Jefferson City, Missouri 65101

(573) 636-6263 (telephone)

(573) 556-3637 (facsimile)

alexander.barrett@stinson.com

Counsel for Defendant Univar Solutions Inc.

CERTIFICATE OF SERVICE

I, G. Patrick Watson, hereby certify that on September 3, 2021, I electronically filed the foregoing Motion to Stay Discovery using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ G. Patrick Watson

G. Patrick Watson